



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

March 24, 2020

**BY EMAIL**

**REQUEST FILING UNDER SEAL**

The Honorable Alvin K. Hellerstein  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: United States v. Tareck Zaidan El Aissami Maddah, et al.,  
S5 19 Cr. 144 (AKH)**

Dear Judge Hellerstein:

The Government respectfully requests that the S5 19 Cr. 144 (AKH) Superseding Indictment (the "Superseding Indictment") and associated arrest warrants be unsealed effective March 26, 2020, at 8:30 a.m.

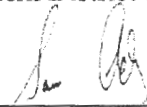
By way of background, on March 13, 2020, a grand jury in this District returned the Superseding Indictment, which charges defendants Tareck Zaidan El Aissami Maddah and Joselit Ramírez Camacho with (i) conspiring to violate the International Emergency Economic Powers Act ("IEEPA"), the Foreign Narcotics Kingpin Designation Act ("Kingpin Act"), and related regulations promulgated by the U.S. Treasury Department's Office of Foreign Assets Control ("OFAC"); (ii) conspiring to commit money laundering; and (iii) substantive violations of the Kingpin Act. Defendant Samark Jose Lopez Bello—who was previously charged in the S4 19 Cr. 144 (AKH) Indictment and remains at large—was also charged in the Superseding Indictment with (i) conspiring to violate IEEPA, the Kingpin Act, and related regulations promulgated by OFAC; and (ii) substantive violations of the Kingpin Act. The Government anticipates that, on the morning of Thursday, March 26, 2020, the Government will announce the above-referenced charges and associated U.S. Department of State rewards for information leading to the capture and/or prosecution of certain of the defendants.

Accordingly, the Government respectfully requests that the Superseding Indictment and all associated arrest warrants be ordered unsealed effective March 26, 2020, at 8:30 a.m. The Government further requests that this letter remain sealed until that time

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney for the  
Southern District of New York

By:

  
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SO ORDERED:

  
Hon. Alvin K. Hellerstein, USDJ